

**School Nutrition Programs – Civil Rights
Instructions for Compiling Racial/Ethnic Data**

Requirements for Racial/Ethnic Data on Program Beneficiaries

Federal civil rights requirements for School Nutrition Programs (SNP) include the collection and review by school food authorities of racial/ethnic data on program beneficiaries. School food authorities are required to:

1. Collect data from program beneficiaries on their racial *and* ethnic groups. Program beneficiaries are those who have applied (approved or denied) for free or reduced-price school meal benefits.
2. Annually record summary data on the racial/ethnic groups of program beneficiaries on the *SNP Civil Rights Compliance Assessment* form, available on the School Nutrition Programs / Civil Rights page of the Minnesota Department of Education Website. The civil rights form must be completed each school year by October 31. (*For the first year the civil rights form is completed, school year 2011-12, the form must be completed by December 1, 2011.*)

Options for Collecting Racial/Ethnic Data from Households

A school food authority must have an ongoing system for participating households to self-identify their racial/ethnic groups for civil rights purposes. To collect racial/ethnic information from program beneficiaries, *use either* of the following two methods:

Option 1 – Collect Racial/Ethnic Data on the Application for Educational Benefits

Participating households can complete the civil rights section on the back page of the *Application for Educational Benefits*.

If a school food authority has any participating households that have *not* self-identified their racial/ethnic groups on the Application, the school food authority must identify, by visual observation, the racial/ethnic groups that those students will be counted in for School Nutrition Programs.

Option 2 – Collect Racial/Ethnic Data as Part of the Student Enrollment Process

A school food authority that already collects racial/ethnic data as part of their student enrollment process does *not* need to collect this data on the *Application for Educational Benefits*.

All public schools collect racial/ethnic data at the time of enrollment and maintain the data in their local student database – see attachment for details about using racial/ethnic data from student enrollment data at public schools. Check with the school district MARSS coordinator concerning access to the local student database.

If a school food authority has any participating households that have *not* self-identified their racial/ethnic groups as part of the enrollment process, the school food authority must identify, by visual observation, the racial/ethnic groups that those students will be counted in for School Nutrition Programs.

Racial and Ethnic Groups

Each student must be identified and counted in one (or more) racial group **and** one ethnic group.

Each student must be identified and counted in one or more of these **five racial groups**:

- *American Indian or Alaskan Native.*
- *Asian.*
- *Black or African-American.*
- *Native Hawaiian or Other Pacific Islander.*
- *White.*

Also, each student must be identified and counted in one of these **two ethnic groups**:

- *Hispanic or Latino* (a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race).
- *Non-Hispanic or Latino* (all other persons not included in the definition above).

The school food authority must identify the race and ethnic groups for any students whose family has not provided this information – see *Options 1* and *2* above.

Annual Record of Summary Racial/Ethnic Data

Section B of the *Civil Rights Compliance Assessment* form is used to record the number of students the school food authority has approved that school year for meal benefits, and the number denied for meal benefits, in each racial and ethnic category. The civil rights form must be completed each school year by October 31. (*For school year 2011-12, the form must be completed by December 1, 2011.*)

Summary data on approved and denied meal applications by racial/ethnic category must be compiled in order to complete Section B of the civil rights form. It is recommended that school food authorities have a system in place to track both approved and denied meal applications so that the summary data can be readily compiled when needed.

Keep the completed civil rights form on file for each year; do not send to the Minnesota Department of Education (MDE). MDE will review the completed civil rights form during on-site administrative reviews.

Note on Total Numbers by Race and Ethnicity:

All students are identified and counted in one or more racial groups **and** in one ethnic category – see *Racial and Ethnic Groups* above. When compiling total numbers by race and ethnicity to complete the annual civil rights form, the total numbers reported in racial groups may exceed the total numbers reported in ethnic groups, because some students may be in more than one racial group. If every student has been identified in only one racial group, then the total number of students reported by racial group will equal the total number of students reported by ethnic group.

If you have any questions about these instructions, contact Minnesota Department of Education – Food and Nutrition Service at 651-582-8526, 800-366-8922 (Minnesota Toll-free) or email to fns@state.mn.us.

**Instructions for Public Schools Using Student Enrollment Data
for School Nutrition Programs Civil Rights Purposes**

The race/ethnicity for each student at a public school is identified in the local student database at the time of the student's enrollment. The racial/ethnic groups used by public schools have changed over time (as required for MARSS reporting). The racial/ethnic groups that are on record for a particular student will depend on which year the data was collected.

Check with the school district MARSS coordinator to access the local student database for racial/ethnic data.

- **Students enrolled *school year 2008-09 and after*:** The racial/ethnic groups used on student enrollment data for students enrolled starting school year 2008-09 are the same as the racial/ethnic groups used on the *SNP Civil Rights Compliance Assessment* form. Each student's enrollment data will show one or more racial groups and one ethnic group. The table shown below is not needed.

- **Students enrolled *before school year 2008-09*:** The racial/ethnic groups used for students enrolled before school year 2008-09 were *not* exactly the same as the racial/ethnic groups used on the *SNP Civil Rights Compliance Assessment* form. Use the table below to determine which racial/ethnic groups to count the students in on the *SNP Civil Rights Compliance Assessment* form.

If the available data shows the student in this group:	Then report the student in this combination of racial and ethnic groups for School Nutrition Programs:	
	Race	Ethnicity
<i>American Indian</i>	<i>American Indian or Alaskan Native</i>	Non-Hispanic or Latino
<i>Asian Pacific Islander</i>	Use <i>Asian</i> category, unless student is known to be <i>Native Hawaiian or Other Pacific Islander</i> , then use that category.	Non-Hispanic or Latino
<i>Black Not of Hispanic Origin</i>	<i>Black or African-American</i>	Non-Hispanic or Latino
<i>White not of Hispanic Origin</i>	<i>White</i>	Non-Hispanic or Latino
<i>Hispanic</i>	The school food authority must assign the racial group (usually the <i>White</i> racial group or the <i>Black or African American</i> racial group) for students with <i>Hispanic or Latino</i> ethnicity.	Hispanic or Latino